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Date: July 7, 1982

From: G. C. Adkins

Subject: "Bait-and-Switch" Charge by Brown & Williamson

Attached is a copy of the June 9 memorandum submitted to the Federal Trade Commission in which Brown & Williamson accused Philip Morris, R. J. Reynolds and American Tobacco of "bait-and-switch" tactics in their advertising for certain ultra-low-tar brands.

The memorandum closes with the suggestion of a reporting system based on tar categories, presumably like the system now used in Great Britain. It also repeats the suggestion, made earlier by B & W in the course of the FTC's investigation of Barclay, that the Commission consider requiring an EPA-type advertising disclaimer about the limitations of standardized laboratory measurements.

jms

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Gloria
I think I've already distributed this B&W release to the Staff. Check w/ Claflin. Thx Jer

Source: https://www.industrydocuments.ucsf.edu/docs/lykk0001